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10 Attorneys for Defendant  
11 Mr. Wilson

12  
13 IN THE UNITED STATES DISTRICT COURT  
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA, ) Case No. 2:21-cr-00155-JAM  
16 Plaintiff, )  
17 vs. ) **STIPULATION AND ORDER TO CONTINUE**  
18 JOSHUA WILSON and ) **STATUS CONFERENCE AND EXCLUDE TIME**  
19 CODY CRAMER, )  
20 Defendants. )  
21 Date: April 23, 2024  
22 Time: 9:00 a.m.  
23 Judge: Hon. John A. Mendez  
24 )  
25 )

26 IT IS HEREBY STIPULATED and agreed by and between United States Attorney  
27 Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for  
28 Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan  
Baigmoammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody  
Cramer that the status hearing currently set for April 23, 2024 at 9:00 be continued to June 4,  
2024 at 9:00 a.m.

29 The parties specifically stipulate as follows:

30 1. By previous order, this matter was set for a status on April 23, 2024 at 9:00 a.m.  
31 2. By stipulation, Mr. Wilson now moves to continue the status conference to **June**  
32 **4, 2024, at 9:00 a.m.**  
33 3. To date, the government has produced approximately 850 pages and various  
34 audio/video recordings of discovery to the defendants.

1       4. Mr. Wilson and Mr. Cramer require additional time to review the discovery,  
2           investigate and research possible defenses, research potential pretrial motions, and  
3           explore potential resolutions to the case, and otherwise prepare for trial.

4       5. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance  
5           would deny them the reasonable time necessary for effective preparation, taking  
6           into account the exercise of due diligence.

7       6. Neither the government nor Mr. Cramer object to the continuance.

8       7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial  
9           Act), the parties request that the time period between April 23, 2024 and June 4,  
10           2024, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv)  
11           (Local Code T4), because it would result from a continuance granted by the Court  
12           at the defense's request, based on a finding that the ends of justice served by  
13           granting the continuance outweighs the best interest of the public, Mr. Wilson,  
14           and Mr. Cramer in a speedy trial.

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1 Respectfully submitted,

2 HEATHER E. WILLIAMS  
3 Federal Defender

4 Date: April 12, 2024

5 /s/ Hootan Baigmohammadi  
6 HOOTAN BAIGMOHAMMADI  
7 Assistant Federal Defender  
8 Attorneys for Mr. Wilson

9 Date: April 12, 2024

10 /s/ Kyle Knapp  
11 Kyle Knapp  
12 Attorney for Mr. Cramer

13 Date: April 12, 2024

14 PHILLIP A. TALBERT  
15 United States Attorney

16 /s/ James R. Conolly  
17 James R. Conolly  
18 Assistant United States Attorney  
19 Attorneys for Plaintiff

## ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: April 16, 2024

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE